

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Wireless E911 Location Accuracy)	PS Docket No. 07-114
Requirements)	
)	
)	

**COMMENTS OF THE INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE,
INTERNATIONAL ASSOCIATION OF FIRE CHIEFS,
NATIONAL ASSOCIATION OF STATE EMERGENCY MEDICAL SERVICES
OFFICIALS, AND NATIONAL SHERIFFS' ASSOCIATION**

The International Association of Fire Chiefs (IAFC), the International Association of Chiefs of Police (IACP), the National Association of State EMS Officials (NASEMSO), and the National Sheriffs' Association together file these reply comments in response to the Federal Communications Commission's (FCC) Fourth Further Notice of Proposed Rulemaking (Fourth FNPRM).¹

I. THE COMMISSION SHOULD ADOPT A 3 METER VERTICAL METRIC AND NARROW THE METRIC OVER TIME

The above organizations reiterate their recommendation that the Commission adopt a vertical location metric of 3 meters and that that the metric be narrowed in five-years' time.

A number of other parties expressed similar support for the adoption of a 3-meter vertical location metric, including AT&T and Verizon Wireless. Nor were we alone in promoting the proposal that the FCC narrow the z-axis metric as time progresses.² The comments of technology

¹ *In the Matter of Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114, Fourth Further Notice of Proposed Rulemaking, FCC 19-20 (March 18, 2019) (*Fourth FNPRM*).

² *See, e.g.*, Initial Comments of the Texas 9-1-1 Entities, PS Docket No. 07-114, at 2 (May 20, 2019) ("*Texas 9-1-1 Comments*") (explaining that "[w]hile the Texas 9-1-1 Entities strongly support Commissioner Rosenworcel's position that the z-axis metric must ultimately evolve to

providers support the argument that location accuracy technology will continue to improve over time, making the adoption of a narrower metric feasible in the future. In their comments, CTIA recognized the continuing evolution of location accuracy technologies, “[a]s vertical location technologies continue to evolve...wireless providers will seek out and evaluate through testing any technology solutions that can provide the public safety community with the most accurate, actionable location information with wireless 9-1-1 calls.”³ Qualcomm similarly observed that, “new technology that supports providing z-axis data may become available within a few years”.⁴ NextNav also explained that “the enforcement of a 3-meter metric should...prompt market forces to ensure that an even more accurate vertical threshold is achieved in practice.”⁵

Based on comments from industry, suggesting that location accuracy technologies will continue to improve with time, and the support for a 3-meter z-axis metric among public safety and leading wireless carriers, the FCC should adopt a vertical location metric of 3 meters and review the 3 meter metric in five years with the intent to narrow the metric to deliver floor-level information.

The IAFC, IACP, NSA, and NASEMSO urge the FCC to continue to press the wireless carriers to achieve compliance with the DL2 requirement and to develop the NEAD database so

being within plus or minus 1 meter to mitigate “floor level” issues, we respectfully also submit that “the ‘perfect’ should not be the enemy of the ‘good’.”); Comments of the Boulder Regional Emergency Telephone Service Authority, PS Docket No. 07-114, at unnumbered page 4 (May 17, 2019).

³ Comments of CTIA, PS Docket No. 07-114, at 10 (May 20, 2019).

⁴ Comments of Qualcomm Incorporated, PS Docket No. 07-114, at 9 (May 20, 2019) (“*Qualcomm Comments*”).

⁵ Comments of NextNav, LLC, PS Docket No. 07-114, at 7 (May 20, 2019) (“*NextNav Comments*”).

that they may eventually be able to deliver accurate and actionable dispatchable location information to 911 dispatchers.

II. CONCLUSION

The IACP, IAFC, NASEMSO and NSA urge the adoption of a 3-meter vertical location metric, with FCC adoption of a narrower metric in five years' time.

Sincerely,

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June 18, 2019